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15 **ATTORNEYS FOR PLAINTIFFS AND THE PUTATIVE CLASS**  
16 (\* denotes *pro hac vice*)

17 **THE UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION**

19 MICHAEL BURROW, individually ) Case No. 8:25-cv-161-FWS-DFM  
20 and on behalf of all others similarly )  
21 situated, )  
22 Plaintiffs, )  
23 vs. )  
24 )  
25 JOHN SHAHIDI, an individual; )  
26 NELK, INC. dba NELK, FULL ) Judge: Fred W. Slaughter  
27 SEND, a Canadian Company, ) Courtroom: 10D  
28 METACARD, LLC, a Delaware )  
29 Limited Liability Company; NELK )  
30 USA, INC., a Delaware Corporation; )  
31 KYLE FORGEARD, an individual, )  
32 )  
33 Defendants. )  
34 )  
35 \_\_\_\_\_)

1 Plaintiff Michael Burrow, pursuant to Rule 41(a) of the Federal Rules of Civil  
2 Procedure, dismisses with prejudice his claims in this action against Defendants JOHN  
3 SHAHIDI, an individual; NELK, INC. dba NELK, FULL SEND, a Canadian  
4 Company, METACARD, LLC, a Delaware Limited Liability Company; NELK USA,  
5 INC., a Delaware Corporation; KYLE FORGEARD, an individual. Rule 41(a) permits  
6 a party to dismiss an action without a court order by filing a notice of dismissal before  
7 the opposing party serves an answer or a motion for summary judgement, neither of  
8 which has been submitted by the Defendants. This Notice of Voluntary Dismissal  
9 applies only to Plaintiff Michael Burrow individually. The remaining named  
10 plaintiff(s) and putative class claims remain in this action.

11 WHEREFORE, Plaintiff Michael Burrow dismissed his individual action only  
12 with prejudice.

13  
14 Dated: September 16, 2025

**KRISTENSEN LAW GROUP &  
EKSM, LLP**

16 /s/ *John P. Kristensen*

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18 Leigh S. Montgomery\*  
19 Jarrett L. Ellzey\*  
20 Tommy Kherkher \*  
Josh Sanford\*

21 *Attorneys for Plaintiffs  
and the Putative Class*  
22 (\* denotes *pro hac vice*)

**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, September 16, 2025, I electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record, including the following participants, pursuant to Fed. R. Civ. P. 5:

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***Co-Counsel for Plaintiffs and The  
Putative Class***

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/s/ *John P. Kristensen*

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